

JAMES T. KEMP, ESQ.

Nevada Bar No.: 6375

KEMP & KEMP

7435 W. Azure Drive, Suite 110

Las Vegas, NV 89130

702-258-1183 ph./702-258-6983 fax

Attorneys for Plaintiff Donavan McIntosh

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONAVAN McINTOSH,

Case No. 2:21-cv-01505-APG-EJY

Plaintiff,

vs.

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR JOINT PRE-  
TRIAL ORDER**

CITY OF NORTH LAS VEGAS, a Municipal Corporation and political subdivision of the State of Nevada; PAMELA OJEDA in her official and/or individual capacities; CLINTON RYAN in his official and/or individual capacities; ALEJANDRO RODRIGUEZ in his official and/or individual capacities; DOES I-X,

**[FOURTH REQUEST]**

Defendants.

Plaintiff Donavan McIntosh (“Plaintiff”) and Defendants City of North Las Vegas (“CNLV”), Pamela Ojeda (“Chief Ojeda”), Clinton Ryan (“Asst. Chief Ryan”), and Alejandro Rodriguez (“Lt. Rodriguez,” and collectively, “Defendants”), by and through their undersigned counsel, hereby file this Stipulation and Order to Extend Deadline for Joint Pre-Trial Order (Third Request). This is the third request to extend this deadline. The parties stipulate that the current deadline of December 15, 2023 should be extended to Friday, December 22, 2023 and informs the court as follows:

1. The current deadline was established by the third request of the parties approved by the court on December 1, 2023.

- 1       2. The parties have been working on the Joint Pre-Trial Order. Defendants' counsel  
2       who returned the draft with their edits to Plaintiff's counsel for his further edits,  
3       objections, and revisions on December 12, 2023.  
4       3. Plaintiff's counsel has been ill for two days and has not been able to work on the Joint  
5       Pre-Trial Order  
6       4. The parties need one more week to complete it as a result of Plaintiff's counsel's  
7       illness.  
8       5. The requested extension is sought in good faith and not for purposes of undue delay.

9       IT IS STIPULATED AND AGREED that the parties shall file the Joint Pre-Trial Order no  
10      later than December 22, 2023.

11      IT IS SO STIPULATED.

13      Dated this 15<sup>th</sup> day of December 2023

14      KEMP & KEMP

15      \_\_\_\_\_  
16      /s/ James P. Kemp  
17      James P. Kemp, NV Bar No. 6375  
18      jp@kemp-attorneys.com  
19      7435 W. Azure Drive, Suite 110  
20      Las Vegas, NV 89130

21      *Attorney for Plaintiff*

14      HONE LAW

15      \_\_\_\_\_  
16      /s/ Jill Garcia  
17      Jill Garcia, NV Bar No. 7805  
18      jgarcia@hone.law  
19      701 N. Green Valley Parkway, Suite 200  
20      Henderson, NV 89074

21      *Attorneys for Defendants*

22      **ORDER**

23      IT IS SO ORDERED.

24        
25      \_\_\_\_\_  
26      UNITED STATES MAGISTRATE JUDGE

27      Dated: December 15, 2023.